

**From:** Eastman, John

**Sent:** Thursday, December 31, 2020 12:15 PM MST

**To:** Kaufman, Alex B. <AKaufman@foxrothschild.com>; Kurt Herbert <kherbert@herbertlaw.com>

**Subject:** RE: Link to entire case

Keeping Bruce and his team off this for the moment.

Here's the issue. The complaint incorporates by reference the state court challenge. Although the President signed a verdict on that back on Dec. 1, he has since been made aware that some of the allegations (and evidence proffered by the experts) has been inaccurate. For him to sign a new verdict with that knowledge (and incorporation by reference) would not be accurate. And I have no doubt that an aggressive DA or US Atty someplace will go after both the President and his lawyers once all the dust settles on this.

I know this late in the day, but do we need to incorporate that complaint by reference?

John

Redacted - WP

